

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

Christine Freeman

JURY TRIAL DEMANDED

v.

CASE NO.

Central Credit Services, Inc.

COMPLAINT

1. This is an action pursuant to the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692 et seq.
2. This court has jurisdiction under 15 U.S.C. §1692k and 28 U.S.C. §§1331 and 1367.
3. Venue is proper in this jurisdiction because the plaintiff resides here and the defendant conducts business here.
4. The plaintiff is a natural person and a consumer within the FDCPA, who resides in Maplewood, Minnesota.
5. The plaintiff incurred a debt on a student loan account with Sallie Mae, Inc. The plaintiff used the loan for personal educational purposes and therefore the debt is a consumer debt as defined by the FDCPA.
6. The defendant is licensed as a Debt Collection Agency by the state of Minnesota.
7. The defendant has been a member of a collectors’ trade organization, ACA International, since 1988.
8. The defendant is a “debt collector” as the term is defined in the FDCPA, because it uses the mails in efforts to collect personal accounts from consumers on behalf of third parties.

9. On or after January 31, 2012, the defendant sent a collection letter to a complete stranger, Regina Framularo, of Trumbull, Connecticut. The collection letter states, "This is an attempt to collect a debt." The letter is therefore a communication as defined by the FDCPA.
10. The letter disclosed the plaintiff's name, creditor, account number, address, and balance due with regard to her personal student loan account ending in 4-113.
11. The plaintiff did not give permission for the debt collector to communicate with Ms. Framularo.

WHEREFORE the plaintiff respectfully requests this court to:

1. Award the plaintiff such actual damages as are permitted by law, as well as \$1,000 statutory damages under the FDCPA.
2. Award the plaintiff costs of suit and a reasonable attorney's fee;
3. Award such other and further relief as law or equity may provide.

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